REMARKS

This Amendment is in response to the Office Action dated February 23, 2007. In the Office Action, claims 1-29 and 31-40 were rejected. With this Amendment, claims 1, 3, 22, 24, 32 and 33 are amended to clarify that which is being claimed. It is respectfully submitted that, claims 1-29 and 31-40 are in condition for allowance.

I. § 112, Second Paragraph Rejections

Claims 1-29 and 31-40 were rejected under 35 U.S.C. §112, 2nd paragraph. Accordingly, claims 1, 3, 22, 24, 32 and 33 are amended. Such amendments are for purposes of addressing the §112 rejection and are by no means introduction of any new material. Therefore, no new search is required. It is respectfully submitted that this rejection be withdrawn.

In particular, claims 1, 3, 5, 11, 12, 15, 18, 20, 22, 24-27, 32, 33, 36 and 38-19 were rejected because "there appears to be insufficient antecedent basis" because the "different portable input device" was defined as a singular element within the independent claims. It is respectfully submitted that the rejection to these claims be withdrawn.

In particular, claim 24 and 32 were rejected because "there is insufficient antecedent basis" for the limitation "the different input devices." Claims 24 and 32 has been amended to recite "the different portable input devices." It is respectfully submitted that the rejection to these claims be withdrawn.

II. § 103(a) Rejections

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all of the claim limitations. In re Vaeck, 20 U.S.P.Q.2d 1438 (Fed. Cir. 1991); M.P.E.P. §2143.

The initial burden is on the examiner to provide some suggestion of the desirability of

doing what the inventor has done. "To support the conclusion that the claimed invention is directed to obvious subject matter, either the references must expressly or impliedly suggest the claimed invention or the examiner must present a convincing line of reasoning as to why the artisan would have found the claimed invention to have been obvious in light of the teachings of the references." *Ex parte Clapp*, 227 USPQ 972, 973 (Bd. Pat. App. & Inter. 1985). It is respectfully submitted that the rejection has omitted essential elements required to establish a *prima facie* rejection.

A. Claims 1-6, 14-16, 20-25, 27-28, 31, 33-34 and 37-39

Claims 1-6, 14-16, 20-25, 27-28, 31, 33-34 and 37-39 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Bjurstrom et al. (US 6,594,348) in view of Chiu et al. (US 2002/0107888) and further in view of Buckley et al. (WO 03/083717). It is respectfully submitted that the Examiner has failed to show a suggestion or motivation either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to combine reference teachings. In addition, the combination of cited references fail to teach or suggest all of the claim elements in independent claims 1, 15, 22, 33 and 38.

Rejecting claims solely by finding prior art corollaries for the claimed elements would permit an Examiner to use the claimed invention itself as a blueprint for piecing together elements in the prior art to defeat the patentability of the claimed invention. Such an approach would be "an illogical and inappropriate process by which to determine patentability." *Sensonics, Inc. v. Aerosonic Corp*, 38 USPQ.2d 1551, 1554 (Fed. Cir. 1996). Therefore, the Examiner is required to show reasons why a skilled artisan would select the elements of the prior art for combination in the manner claimed. On page six of the current Office Action, the Examiner asserts that by modifying Bjurstrom et al. and Chiu et al.'s methods with Buckley et al.'s ability, users can interact with their own device which "has the ability to share information among a shared environment by allowing user to send their information to a shared display, and allowing users to retrieve the information from the shared display." The Applicant respectfully submits that such a reason does not indicate a suggestion or motivation to combine the cited references.

In particular, users having input devices that could share information between each other would be of no benefit or value to Bjurstrom et al. or Chiu et al. Bjurstrom et al. and Chiu et al. are concerned with browsing HTML pages.

On page five of the current Office Action, the Examiner states that Bjurstrom et al. fails to disclose "controlling a shared display module to display the alternate component activation tag with the convert component in the hypertext document" and "activating the converted component in the hypertext document displayed on the display module by receiving an input signal related to the alternate component activation tag from at least one of a plurality of portable input devices operated by one of the plurality of users that are viewing the display module." The Examiner, however, points to Chiu et al. as disclosing "a system for browsing online using numeric keys wherein a displayed document containing plurality of hyperlinks is edited to include[ing] a correspond number to the plurality of hyperlinks, wherein the updated document is displayed with the corresponding number next to its corresponding hyperlink." On page six of the current Office Action, the Examiner state that "Bjurstrom and Chiu et al. fail to specifically disclose controlling a shared display module . . . wherein the shared display module is simultaneously viewable by a plurality of users of which each user is simultaneously interacting a different portable input device." The Examiner, however, points to Buckley et al. as disclosing "a shared display screen simultaneously viewable by a plurality of users of which users are interacting simultaneously with their own input device."

In regards to independent claim 1, even if one were to combine the cited references, the combination of references fail to teach or suggest "activating the converted components in a hypertext document on the shared display module by receiving input signals related to the alternate component activation tags from the different portable input devices." Bjurstrom et al. discloses associating elements of a HTML page to DMTF tones and implementing a function on a HTML page in response to receiving DMTF tones from a telephone (see col. 5, line 54 to col. 9, line 67). Chiu et al. discloses displaying symbols next to hyperlinks so that a user can operate the hyperlink by using a numeric key. None of the references disclose the activation of converted components in the hypertext document displayed on the shared display module (which is

viewable by a plurality of users of which each user is simultaneously interacting with a different portable input device) based on the receipt of input signals related to the converted components from the different portable input devices. Although a plurality of users can view a television (as in Chiu et al.) and a remote control can control items on the television screen or a shared display screen can be associated with input devices (as in Buckley et al.), such displays do not allow for the activation of components or alternate component activation tags on the display by different portable input devices of which each user viewing the display is simultaneously interacting with as is claimed in claim 1. It is respectfully submitted that claim 1 is allowable over the cited references as well as claims 2-6 and 14 that depend therefrom.

In regards to independent claim 15, even if one were to combine the cited references, none of the references disclose the activation of a browsing mode in the hypertext document displayed on the shared display module (which is viewable by a plurality of users of which each user is simultaneously interacting with a different portable input device) based on the receipt of input signals related to alternate browsing activation tags from the different portable input devices. In addition, as discussed above, although a television (as in Chiu et al.) can be viewed by two or more people and a shared display screen can be associated with input devices (as in Buckley et al.), such a display does not allow for the activation of browsing modes by different portable input devices of which each of a plurality of users is simultaneously interacting with as is claimed in claim 15. It is respectfully submitted that claim 15 is allowable over the cited references as well as claims 16, 20 and 21 that depend therefrom.

In regards to independent claim 22 and similar to the discussion in regards to claim 1, even if one were to combine the cited references, none of the references disclose an input processor that receives and processes input signals related to alternate component activation tags displayed on the shared display module (which is viewable by a plurality of users of which each user is simultaneously interacting with a different portable input device) from the different portable input devices. In addition, as discussed above, although a television (as in Chiu et al.) can be viewed by two or more people and a shared display screen can be associated with input devices (as in Buckley et al.), such a display does not allow for the receipt and processing of

input signals related to converted components displayed to a plurality of users of which each user is simultaneously interacting with a different portable input device as is claimed in claim 22. It is respectfully submitted that claim 22 is allowable over the cited references as well as claims 23-25, 27-28 and 31 that depend therefrom.

In regards to independent claim 33 and similar to the discussion in regards to claim 15, even if one were to combine the cited references, none of the references disclose an input processor that receives and processes input signals related to an alternate browsing activation tag displayed on the shared display module (which is viewable by a plurality of users of which each user is simultaneously interacting with a different portable input device) from the different portable input devices. In addition, as discussed above, although a television (as disclosed in Chiu et al.) can be viewed by two or more people and a shared display screen can be associated with input devices (as in Buckley et al.), such a display does not allow for the receipt and processing of input signals related to converted browsing modes displayed to a plurality of users of which each user is simultaneously interacting with a different portable input devices as is claimed in claim 33. It is respectfully submitted that claim 33 is allowable over the cited references as well as claims 34 and 37 that depend therefrom.

In regards to independent claim 38 and similar to the discussion in regards to claim 1, even if one were to combine the cited references, none of the references disclose the activation of a converted component in the hypertext document displayed on the shared display module (which is viewable by a plurality of users of which each user is simultaneously interacting with the different portable input devices) based on the receipt of an input signal related to the converted component from the different portable input devices. In addition, as discussed above, although a television (as disclosed in Chiu et al.) can be viewed by two or more people and a shared display screen can be associated with input devices (as in Buckley et al.), such a display does not allow for the activation of converted components displayed to a plurality of users by a the different input devices as is claimed in claim 38. It is respectfully submitted that claim 38 is allowable over the cited references as well as claim 39 that depends therefrom.

B. Claims 7 and 9

Claims 7 and 9 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Bjurstrom et al. in view of Chiu et al., in further view of Buckley et al. and in further view of Lai et al. (US 6,912,326). It is respectfully submitted that claims 7 and 9 are in condition for allowance at least based on their dependency on allowable claim 1.

C. Claim 8

Claim 8 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Bjurstrom et al. in view of Chiu et al., in further view of Buckley et al., in further view of Lai et al. and in further view of Sotomayor (US 5,708,825). It is respectfully submitted that claim 8 is in condition for allowance at least based on its dependency on allowable claim 1.

D. Claims 10-13, 17-19, 29, 35-36 and 40

Claims 10-13, 17-19, 29, 35-36 and 40 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Bjurstrom et al. in view of Chiu et al., in further view of Buckley and in further view of Borman et al. (US 6,226,955). It is respectfully submitted that claims 10-13, 17-19, 29, 35-36 and 40 are in condition for allowance at least based on their dependency on allowable claims 1, 15, 22 and 33.

However, these dependent claims are allowable for additional reasons. For example, the cited references fail to teach or suggest "controlling the shared display module to display the automated browsing modes and automated browsing activation tags to the plurality of users" as claimed in claim 10 and 40 and "controlling the shared display module to display the automated browsing modes and automated browsing activation tags to the plurality of users" as claimed in claim 17.

E. Claim 26

Claim 26 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Bjurstrom et al. in view of Chiu et al., in further view of Buckley et al. and further in view of Tanenbaum. It is

respectfully submitted that claim 26 is in condition for allowance at least based on its dependency on allowable claim 22.

However, dependent claim 26 is allowable for additional reasons. For example, the cited references fail to teach or suggest that "the input processor is further configured to process different types of input signals received from the different portable input devices in an order" as claimed in claim 26.

F. Claim 32

Claim 32 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Bjurstrom et al. in view of Chiu et al., in further view of Buckley et al. and in further view of Giacalone, Jr. (US 2001/0052000). It is respectfully submitted that claim 32 is in condition for allowance at least based on its dependency on allowable claim 22.

For the reasons stated above, it is respectfully submitted that all pending claims 1-29 and 31-40 are in condition for allowance. Favorable action is respectfully requested.

The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

Respectfully submitted,

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